

## **REMARKS**

The Office Action dated June 14, 2010 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

Claims 1-63 are currently pending in the application and are respectfully submitted for consideration.

### **Rejection under 35 U.S.C. § 103**

*Claims 1-11 and 13-63 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Salmivalli (U.S. Patent No. 6,324,399) in view of Herrero (U.S. Publication No. 2005/0009520). The Office Action took the position that the combination of Salmivalli and Herrero teaches all of the features of the rejected claims. Applicants respectfully traverse the rejection.*

Independent claim 1, from which claims 2-18 and 38 depend, recites a method including receiving at least one registration request to register a user requesting a service in a network entity in an internet protocol multimedia core network subsystem of a communication system and providing the network entity with control information indicating at least one limitation on a plurality of simultaneous registrations. The control information indicates a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity. The method also includes controlling the registration based on the control information.

Independent claim 19, from which claims 20-31 depend, recites a system including a network entity configured to receive at least one request to register a user requesting a service in a network entity in an internet protocol multimedia core network subsystem and a providing unit configured to provide the network entity with control information indicating at least one limitation on a plurality of simultaneous registrations. The control information indicates a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity. The system also includes a controlling unit configured to control the registration based on the control information.

Independent claim 32, from which claims 33-37 depend, recites an apparatus including receiving means for receiving at least one registration request for registration of a user requesting a service in an internet protocol multimedia core network subsystem and receiving control means for receiving control information indicating at least one limitation on a plurality of simultaneous registrations. The control information indicates a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity. The apparatus also includes controlling means for controlling the registration based on the control information.

Independent claim 39, from which claims 40-52 depend, recites an apparatus including a receiver configured to receive at least one registration request to register a user requesting a service in a network entity in an internet protocol multimedia core network subsystem. The receiver is further configured to receive control information

indicating at least one limitation on a plurality of simultaneous registrations. The control information indicates a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity. The apparatus also includes a controller configured to control the registration based on the control information.

Independent claim 53, from which claims 54-63 depend, recites method, including receiving at least one registration request to register a user requesting a service in a network entity in an internet protocol multimedia core network subsystem, and receiving control information indicating at least one limitation on a plurality of simultaneous registrations. The control information indicates a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity. The method includes controlling the registration based on the control information.

As will be discussed below, Salmivalli and Herrero, both individually and in combination, fail to teach or suggest all of the features of the presently pending claims.

Salmivalli generally discusses a method of controlling subscriber registrations in a mobile communication system where subscriber data concerning visiting subscribers is temporarily stored in a visitor location register. FIG. 3 of Salmivalli describes that a test is made to see if a subscriber registration quota is set on the PLMN (public land mobile networks) of the mobile station for controlling subscriber registrations. See column 5, lines 15-45. A subscriber registration quota means that only a limited percentage of the register capacity of the network is allocated to the subscribers of the specific PLMN. The

subscriber registration quota is presented by means of a maximum number of simultaneous subscriber registrations.

Herrero generally describes a method for supporting multiple registrations from the same use requested from different terminals in a telecommunication system. The method allows further multiple session establishment to any of those terminals. In the home server of the user it is stored a plurality of private identities related to the subscriber data of the user together with, at least, a public identity. Each registration of the user contains a public identity assigned to the user and a private identity among the plurality of the private identities assigned to the user.

However, contrary to the contentions made in the Office Action, Salmivalli does not teach or suggest, at least, “providing the network entity with control information indicating at least one limitation on a plurality of simultaneous registrations, said control information indicating a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity,” as recited in independent claim 1 and similarly recited in independent claims 19, 32, 39, and 53.

In the Response to Arguments section, page 3, lines 1-2, the Office Action erroneously submits that “[i]t is well known in the art for the NMSI to represent the phone number therefore, the NMSI is the contact address.” Applicants respectfully argue that the Office Action appears to be mixing two different terms: a phone number (MSISDN) and a subscriber identity (IMSI). As submitted in the bottom of page 2 of the Office Action, IMSI consists of mobile country code (MCC) and national mobile station

identity (NMSI). The NMSI consists of the MNC (Mobile Network Code) and the MSIN (Mobile Subscriber Identification Number). However, IMSI or any part of it (NMSI, MSIN) does not contain a phone number of the user as contended by the Office Action. To support of Applicants' contentions, an Appendix is filed with this Response including sections 1.8.4 and 1.9-1.9.4 of 2.5G Mobile Networks: GPRS and EDGE. Table 1.2 shown on page 35 of 2.5G Mobile Networks: GPRS and EDGE, IMSI and MSISDN are explained. MSISDN is the phone number that is used to dial the user. IMSI identifies the subscriber in the operators network system for management purposes. IMSI is associated with a SIM card. In addition, section 1.9 on page 34 states that a single IMSI may be associated with multiple MSISDNs, that is, multiple telephone numbers.

In addition, it is well known in the art that a subscriber can change the phone number without changing the SIM card, thus, without changing the IMSI. It is also well known in the art that a subscriber can keep the phone number when changing a service provider; that is, change of the SIM card and the IMSI. Therefore, it is clear that IMSI or any part of it (NMSI) cannot contain the phone number of the subscriber because one of them (IMSI/MSISDN) can be changed independently without the other one changing and vice versa.

It is well known in the art that a subscriber's phone number cannot be retrieved from the IMSI. Therefore, IMSI or NMSI cannot be referred, as submitted in the Office Action, as contact address of the user as recited in independent claims 1, 19,

32, 39, and 53. Knowing IMSI alone does not teach or enable a person of ordinary skill in the art to contact the user.

On page 3 of the Office Action, the Office Action appears to have changed its position. Instead of construing the description of Samivalli providing the “PLMN derived from the IMSI” to be describing or to be the same as “...single public **user** identity,” as recited in independent claim 1 and similarly recited in independent claims 19, 32, 39, and 53, the Office Action appears to refer to MCC or MNC to disclose such claimed feature. However, neither the MCC nor MNC teach or suggest “single public **user** identity,” as recited in the claims. MCC refers to a country and MNC refers to a network in the country. Page 35 of 2.5G Mobile Networks: GPRS and EDGE, filed herewith, clearly supports Applicants’ contentions. Therefore, a person of ordinary skill in the art would appreciate that MCC or MNC is not referring to identity of an (end) user as the Office Action appears to contend. A person of ordinary skill in the art would appreciate that the description of Samivalli does not teach or suggest, “said control information indicating a restriction on a number of different contact addresses that can be simultaneously registered *using a single public **user** identity*,” as recited in independent claim 1 and similarly recited in independent claims 19, 32, 39, and 53.

In Salmivalli, only a limited percentage of the register capacity of the network is allocated to the subscribers of the specific PLMN. There is no description or suggestion providing that restriction is based on a number of different contact addresses that can be

simultaneously registered *using a single public user identity* as recited in the independent claims.

Furthermore, FIG. 5 of Salmivalli describes that registrations may be limited in connection with location updating, when the mobile station has moved to the area of another visitor location register VLR. See column 6, lines 7-32. The subscriber group of the mobile station is identified on the basis of the IMSI (International Mobile Subscriber Identity) sent in connection with the location updating request.

In addition, Applicants respectfully submit that the description of Salmivalli as a whole makes it evident that the focus of this reference is that a limitation can be set on how many subscribers **per network operator (PLMN)** can be simultaneously registered to the network. In contrast, in the present features of the independent claims clearly set forth on how many contacts (e.g. devices) **a single user** can simultaneously register to the network.

Herrero, in turn, does not cure the deficiencies of Salmivalli. Although Herrero describes that each registration of the user contains a public identity assigned to the user and a private identity among the plurality of the private identities assigned to the user, such description, in combination with that provide in Salmivalli, does not teach or suggest, at least, “providing the network entity with control information indicating at least one limitation on a plurality of simultaneous registrations, said control information indicating a restriction on a number of different contact addresses that can be simultaneously registered *using a single public user identity*,” emphasis added, as recited

in independent claim 1 and similarly recited in independent claims 19, 32, 39, and 53. Similar to Salmivalli, nothing in Herrero provides a teaching or suggestion that would enable a person of ordinary skill in the art to provide the network entity with control information using a single public user identity. Accordingly, a combination of Salmivalli and Herrero would be deficient in teaching all the claimed features of independent claims 1, 19, 32, 39, and 53.

The outstanding rejection would appear to have taken the teachings of the present invention and applied the same to modify Salmivalli and Herrero, as set forth in the Office Action, to then disclose the presently claimed invention. Applicants respectfully assert that the *prima facie* burden has not been met.

In view of the foregoing, Applicants respectfully requests that claims 1-63 be allowed.

*Claim 12 was rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Salmivalli (U.S. Patent No. 6,324,399) in view of Herrero (U.S. Publication No. 2005/0009520) and further in view of Sonti et al. (U.S. Patent No. 6,108,540). The Office Action took the position that the combination of Salmivalli, Herrero, and Sonti teaches all of the features of the rejected claims. Applicants respectfully traverse the rejection. Reconsideration of the claims is respectfully requested.*

Because Salmivalli, Herrero, and Sonti must teach all the recitations of the base claim and any intervening claims of dependent claim 12, the arguments presented above



supporting the patentability of independent claim 1 over Salmivalli and Herrero are incorporated herein to support the patentability of dependent claim 12.

Sonti generally describes a method for allowing subscribers of a telecommunications network to change easily between sets of desired features is disclosed. The home location register stores multiple profiles of all subscribers within its serving region along with an active profile number field indicating the list of features currently available to each subscriber. Upon initial registration of the mobile station at a mobile switching center communicating with the home location register, a default profile is extracted from the home location register. Upon dialing a special code or number, a subscriber can prompt a change of profile containing a different set of features for different users of the mobile station or for different times of day or geographic areas. In this way, subscribers bypass the routine of having to contact an agent in order to add or remove features and are allowed to switch among multiple profiles at will. A personal identification number can be used to enhance the security of the profile change procedure.

However, similarly to Salmivalli and Herrero, Sonti is devoid of any teaching or suggestion of “providing the network entity with control information indicating at least one limitation on a plurality of simultaneous registrations, said control information indicating a restriction on a number of different contact addresses that can be simultaneously registered *using a single public user identity*,” emphasis added, as recited in independent claim 1. Nothing in Sonti teaches or suggests that a method may use a

single public user identity. Sonti is silent as to teaching that control information may indicate a restriction on a number of different contact addresses that can be simultaneously registered using a single public user identity.

Therefore, Sonti fails to cure the deficiencies of Salmivalli and Herrero. It is respectfully requested that claim 12 be allowed.

## **Conclusion**

For at least the reasons presented above, it is respectfully submitted that claims 1-63, comprising all of the currently pending claims, patentably distinguish over the cited art. Accordingly, it is respectfully requested that the claims be allowed and the application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time.

Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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Enclosures: Appendix of 2.5G Mobile Networks: GPRS and EDGE, Sumit Kasera et al., pages 34-36, 2008